

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

GE HFS HOLDINGS, INC., f/k/a)
HELLER HEALTHCARE FINANCE,)
INC.,)
)
Plaintiff,)
)
And)
)
MICHAEL INGOLDSBY,)
)
Intervenor/Plaintiff,)
)
v.)
)
NATIONAL UNION FIRE)
INSURANCE COMPANY OF)
PITTSBURGH, PA., and)
INTERNATIONAL INSURANCE)
GROUP, LTD.,)
)
Defendants.)

Civil Action No. 05-CV-11128-NG

**ASSENTED TO MOTION FOR EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S OBJECTIONS TO REPORT AND RECOMMENDATION**

Pursuant to Fed. R. Civ. P. Rule 6(b), Defendant National Union Fire Insurance Company of Pittsburgh, PA. ("National Union") hereby requests an extension of its time to file a response to Plaintiff-Intervenor Michael Ingoldsby's ("Plaintiff") Objections to Magistrate Judge's Report and Recommendation on Motion of National Union for Summary Judgment ("Plaintiff's Objections"). As grounds for its motion, National Union states as follows:

1. On June 14, 2007, Magistrate Judge Dein issued her Report and Recommendation concerning National Union's Motion for Summary Judgment and Plaintiff's Cross-Motion for Summary Judgment. The Report and Recommendation recommends that National Union's Motion for Summary Judgment be allowed and that Plaintiff's Cross-Motion be denied.

2. On June 28, 2007, Plaintiff filed his Objections to the Report and Recommendation.

3. Pursuant to the Rules for United States Magistrate Judges in the United States District Court for the District of Massachusetts, National Union's response to Plaintiff's Objections is currently due to be filed on or before July 13, 2007.

4. Because of counsel for National Union's schedule, National Union requires an extension of time to file its response to Plaintiff's Objections.

5. Plaintiff has assented to an extension of National Union's time to file its response through and including July 27, 2007.

6. No party will be prejudiced by an enlargement of National Union's time to file its response.

WHEREFORE, for the reasons stated herein and for good cause shown, National Union requests that its time for filing a response to Plaintiff's Objections be extended through and including July 27, 2007.

NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA

By its attorneys,

Dated: July 2, 2007

/s/ Joey H. Lee
John D. Hughes (BBO# 243660)
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CERTIFICATE OF SERVICE

I, Joey H. Lee, hereby certify that on this 2nd day of July, 2007, I served a copy of the foregoing document via ECF on Gregory J. Aceto, Johnson & Aceto, P.C., 67 Batterymarch Street, Suite 400, Boston, MA 02110 and Richard E. Heifetz, Tucker, Heifetz & Saltzman, LLP, Three School Street, Boston, MA 02108.

/s/ Joey H. Lee

Joey H. Lee